



State of Utah

Department of
Environmental Quality

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Executive Director

DIVISION OF AIR QUALITY
Richard W. Sprott
Director

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Governor

GARY HERBERT
Lieutenant Governor

DAQE-IN0580003-06

September 14, 2006

Greg Burton
Hallmark Cabinet Company
4851 South Warehouse Road
Kearns, Utah 84118

Dear Mr. Burton:

Re: Intent to Approve: Modify DAQE-AN0580002-05 to Increase Production, Salt Lake County –
CDS B; NA; HAPs
Project Code: N0580-003

The attached document is the Intent to Approve (ITA) for the above-referenced project. ITAs are subject to public review. Any comments received shall be considered before an Approval Order is issued.

Future correspondence on this Intent to Approve should include the engineer's name as well as the DAQE number as shown on the upper right-hand corner of this letter. Please direct any technical questions you may have on this project to Mr. Tim De Julis. He may be reached at (801) 536-4012.

Sincerely,

Tim Blanchard, Acting Manager
Minor New Source Review Section

TB:TDJ:kw

cc: Salt Lake Valley Health Department

Mike Owens, EPA Region VIII

STATE OF UTAH

Department of Environmental Quality

Division of Air Quality

**INTENT TO APPROVE: Modify DAQE-
AN0580002-05 to Increase Production**

**Prepared By: Tim De Julis, Engineer
(801) 536-4012
Email: tdejulis@utah.gov**

INTENT TO APPROVE NUMBER

DAQE-IN0580003-06

Date: September 14, 2006

Hallmark Cabinets

**Source Contact
John M. Palo
(801) 966-0562**

**Richard W. Sprott
Executive Secretary
Utah Air Quality Board**

Abstract

Hallmark Cabinet Company (HCC), owner, and operator of the wood furniture manufacturing plant located at 4851 South Warehouse Drive, Kearns, Salt Lake County has requested permission to increase plant production and the related VOC/HAP emission limits. Salt Lake County is a Non-attainment area of the National Ambient Air Quality Standards (NAAQS) for PM_{10} and SO_2 . New Source Performance Standards (NSPS), National Emission Standards for Hazardous Air Pollutants (NESHAP), and Maximum Available Control Technology (MACT) regulations do not apply to this source. Title V of the 1990 Clean Air Act does not apply to this source.

The emissions, in tons per year, will change as follows:

PM_{10} (+ 0.19), NO_x (+ 0.17), CO (+0.14), HAPs (+ 5.19)

The potential to emit totals, in tons per year, are:

PM_{10} = 0.42, NO_x = 0.38, CO = 0.32, VOC = 21.54, HAPs = 14.99

The Notice of Intent (NOI) for the above-referenced project has been evaluated and has been found to be consistent with the requirements of the Utah Administrative Code Rule 307 (UAC R307). Air pollution producing sources and/or their air control facilities may not be constructed, installed, established, or modified prior to the issuance of an Approval Order (AO) by the Executive Secretary of the Utah Air Quality Board.

A 30-day public comment period will be held in accordance with UAC R307-401-7. A notice of intent to approve will be published in the Salt Lake Tribune and Deseret News on September 18, 2006. During the public comment period the proposal and the evaluation of its impact on air quality will be available for both you and the public to review and comment. If anyone so requests a public hearing it will be held in accordance with UAC R307-401-7. The hearing will be held as close as practicable to the location of the source. Any comments received during the public comment period and the hearing will be evaluated.

Please review the proposed AO conditions during this period and make any comments you may have. The proposed conditions of the AO may be changed as a result of the comments received. Unless changed, the AO will be based upon the following conditions:

General Conditions:

1. This Approval Order (AO) applies to the following company:

Corporate and Site Office
Hallmark Cabinet Company
4851 S. Warehouse Road
Kearns, UT 84118-6398

Phone Number (801) 966-0562
Fax Number (801) 966-8114

The equipment listed in this AO shall be operated at the following location:

PLANT LOCATION:

4851 S. Warehouse Road, Kearns, Salt Lake County

Universal Transverse Mercator (UTM) Coordinate System: UTM Datum NAD27
4,501.73 kilometers Northing, 414.55 kilometers Easting, Zone 12

2. All definitions, terms, abbreviations, and references used in this AO conform to those used in the Utah Administrative Code (UAC) Rule 307 (R307), and Title 40 of the Code of Federal Regulations (40 CFR). Unless noted otherwise, references cited in these AO conditions refer to those rules.
3. The limits set forth in this AO shall not be exceeded without prior approval in accordance with R307-401.
4. Modifications to the equipment or processes approved by this AO that could affect the emissions covered by this AO must be reviewed and approved in accordance with R307-401.
5. All records referenced in this AO, which are required to be kept by the owner/operator, shall be made available to the Executive Secretary or Executive Secretary's representative upon request, and the records shall include the two-year period prior to the date of the request. Records shall be kept for the following minimum periods:
 - A. Emission inventories Five years from the due date of each emission statement or until the next inventory is due, whichever is longer.
 - B. All other records Two years
6. HCC shall install and operate the two additional paint booths, and shall conduct its operations of the Kearns wood furniture manufacturing plant in accordance with the terms and conditions of this AO, which was written pursuant to HCC's Notice of Intent submitted to the Division of Air Quality (DAQ) on July 17, 2005, and additional information submitted July 25, 2006, August 21, 2006, and August 28, 2006.
7. This AO shall replace the AO (DAQE-AN0580002-05) dated March 25, 2005.
8. The approved installations shall consist of the following equipment (or equivalent*):
 - A. Seven (7) - Paint Booths
Attached equipment- each: Dry Paint Arresters
 - B. Two (2) – Fabric Filter Baghouses **
(the exhaust from each is directed to the interior of the production building)

Various combustion devices rated less than 5,000,000 Btu/hr – each **

C. One (1) - Natural Gas Fueled Oven System

D. Six (6) - Natural Gas Fueled Shop Heaters

E. Two (2) - Natural Gas Fueled Make-up Air Heaters

* Equivalency shall be determined by the Executive Secretary.

** This is listed for informational purposes only.

Limitations and Tests Procedures

9. Visible emissions from any stationary point or fugitive emission source associated with the source or with the control facilities shall not exceed 10% opacity. Opacity observations of emissions from stationary sources shall be conducted in accordance with 40 CFR 60, Appendix A, Method 9.

10. The following limit shall not be exceeded:

2,875 hours of plant operation per rolling 12-month period

Compliance with the limitation shall be determined on a rolling 12-month total. The owner/operator shall calculate a new 12-month total by the twentieth day of each month using data from the previous 12 months. Records of operation shall be kept for all periods when the plant is in operation. Records of operation, including rolling 12-month totals, shall be made available to the Executive Secretary, or Executive Secretary's representative upon request. Supervisor monitoring and maintaining of an operations log shall determine plant hours of operation.

Fuels

11. The owner/operator shall use only natural gas as primary fuel and propane as a backup fuel in all fuel burning equipment.

Volatile Organic Compound (VOC) and Hazardous Air Pollutants (HAPs) Limitations

12. The plant-wide emissions of VOCs and HAPs from the paint booths, contact cement applicators, and associated operations shall not exceed:

21.54 tons per rolling 12-month period for VOCs

9.80 tons per rolling 12-month period for Toluene

4.88 tons combined per rolling 12-month period for Cobalt 2-Ethyl Hexanoate, Cumene, Ethyl Benzene, Formaldehyde, Hexa-Methylene Di-Iso-Cyanate, Methanol, Methyl Isobutyl Ketone, Napthalene, Nickel Antimony Titanate, Styrene, Xylene

Compliance with each/the limitation shall be determined on a rolling 12-month total. Based on the twentieth day of each month, a new 12-month total shall be calculated using data from the previous 12 months.

The VOC or HAP emissions shall be determined by maintaining a record of VOC or HAP emitting materials used each month. The record shall include the following data for each material used:

- A. Name of the VOC or HAPs emitting material, such as: paint, adhesive, solvent, thinner, reducers, chemical compounds, toxics, isocyanates, etc.
- B. Density of each material used (pounds per gallon)
- C. Percent by weight of all VOC or HAP in each material used
- D. Gallons of each VOC or HAP emitting material used
- E. The amount of VOC or HAP emitted monthly by each material used shall be calculated by the following procedure:

$$\text{VOC} = \frac{\% \text{ VOC by Weight}}{(100)} \times [\text{Density } (\frac{\text{lb}}{\text{gal}})] \times \text{Gal Consumed} \times \frac{1 \text{ ton}}{2000 \text{ lb}}$$

$$\text{HAP} = \frac{\% \text{ HAP by Weight}}{(100)} \times [\text{Density } (\frac{\text{lb}}{\text{gal}})] \times \text{Gal Consumed} \times \frac{1 \text{ ton}}{2000 \text{ lb}}$$

- F. The amount of VOC or HAP emitted monthly from all materials used.
- G. The amount of VOCs or HAPs reclaimed for the month shall be similarly quantified and subtracted from the quantities calculated above to provide the monthly total VOC or HAP emissions.

Records & Miscellaneous

13. At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any equipment approved under this Approval Order including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Executive Secretary which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. All maintenance performed on equipment authorized by this AO shall be recorded.
14. The owner/operator shall comply with R307-150 Series. Inventories, Testing and Monitoring.
15. The owner/operator shall comply with R307-107. General Requirements: Unavoidable Breakdowns.

The Executive Secretary shall be notified in writing if the company is sold or changes its name.

This AO in no way releases the owner or operator from any liability for compliance with all other applicable federal, state, and local regulations including R307.

A copy of the rules, regulations and/or attachments addressed in this AO may be obtained by contacting the Division of Air Quality. The Utah Administrative Code R307 rules used by DAQ, the Notice of Intent (NOI) guide, and other air quality documents and forms may also be obtained on the Internet at the following web site:

<http://www.airquality.utah.gov/>

The annual emissions estimations below include point source, or fugitive emissions, and do not include fugitive dust, road dust, tail pipe emissions, or grandfathered emissions. These emissions are for the purpose of determining the applicability of Prevention of Significant Deterioration, non-attainment area, Maintenance area, and Title V source requirements of the R307. They are not to be used for determining compliance.

The Potential To Emit (PTE) emissions for HCC's Kearns wood furniture manufacturing plant are currently calculated at the following values:

	<u>Pollutant</u>	<u>Tons/yr</u>
A.	PM ₁₀	0.42
B.	NO _x	0.38
C.	CO	0.32
D.	VOC	21.54
E.	HAPs	
	Toluene	9.80
	Other HAPs.....	4.88
	Total HAPs	14.99

The Division of Air Quality is authorized to charge a fee for reimbursement of the actual costs incurred in the issuance of an AO. An invoice will follow upon issuance of the final Approval Order.

Sincerely,

Tim Blanchard, Acting Manager
Minor New Source Review Section